EXHIBIT E32

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1
             SUPERIOR COURT OF WASHINGTON
                   FOR KING COUNTY
 2.
 3
      JODY E. RATCLIFF,
 4
                Plaintiff,
 5
                                 No. 16-2-18128-7
      v.
                                 SEA
 6
      BORGWARNER MORSE TEC
      LLC, et al.,
                Defendants.
 8
 9
              THURSDAY, FEBRUARY 1, 2018
10
11
               Videotaped Deposition of Frederick
     Pooley, Ph.D., held at the offices of Orrick,
12
13
     Herrington & Sutcliffe LLP, 51 West 52nd
     Street, New York, New York, commencing at
14
     9:31 a.m., on the above date, before Carrie
15
16
     A. Campbell, Registered Diplomate Reporter,
17
     Certified Realtime Reporter, Illinois,
18
     California & Texas Certified Shorthand
19
     Reporter, Missouri & Kansas Certified Court
20
     Reporter.
21
22
              GOLKOW LITIGATION SERVICES
23
                       877.370.DEPS
                     deps@golkow.com
24
25
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4	BY: W. MARK LANIER, ESQ.		4	EXAMINA	ANCESATIONS	∠
"	wml@lanierlawfirm.com 6810 FM 1960 West		5		R. BICKS	15
5	Houston, Texas 77069		6	BY MF	R. LANIER	133
6	(713) 659-5200		7		R. BICKS	
7			8		R. LANIER	
8	LANIER LAW FIRM, P.C. BY: RACHEL LANIER, ESO.		10		R. LANIER	
~	rachel.lanier@lanierlawfirm.com		11			
9	DARRON BERQUIST, ESQ.		12		EXHIBITS	
10	darron.berquist@lanierlawfirm.com SHANNON TULLY, ESQ.		13	No. 1	Description	Page
11	shannon.tully@lanierlawfirm.com		14	1	Curriculum Vitae- Frederick David Pooley	18
111	ETHAN HORN, ESQ. ethan.horn@lanierlawfirm.com		15		100107	
12	126 East 56th Street, Sixth Floor			2	Occupational Exposures to	37
13	New York, New York 10022 (212) 421-2800		16		Non-Asbestiform Talc in Vermont,	
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16	lec@lanierlawfirm.com		18	-	JNJ 000325709 - JNJ 000325722	
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18 19	Counsel for Plaintiffs		20		Department of Mineral Exploitation, University College,	
20	ORRICK, HERRINGTON & SUTCLIFFE LLP		21		Cardiff,	
21	BY: PETER A. BICKS, ESQ.				FDP00000381 - FDP00000430	
Z1	pbicks@orrick.com ALLEGRA AUSILIA NOONAN, ESQ.		22			
22	anoonan@orrick.com			5	Report of the Analysis of J. & J.	54
23	51 West 52nd Street New York, New York 10019		23		International Talc Samples, Department of Mineral	
	(212) 506-3742		24		Exploitation, University College,	
24	Counsel for Defendant Johnson & Johnson				Cardiff,	
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2	BY: JOSHUA L. BECKER, ESQ. josh.becker@alston.com		2		Donald M. Benninger, J&J-0163931	
	1201 West Peachtree Street Suite 4900		3			
3	Atlanta, Georgia 30309-3424		4	7	Talc Product Safety and Purity Project: 1. Talc Ore Sampling -	62
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4	Counsel for Imerys and Cyprus				September, 1971,	
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23 24 25			24		letter from Pooley to A.J. Goudie, JNJMX68_000004230 - JNJMX68_000004231	

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1	control, you know, internationally over the	1	you want to put it that way, associated with
2	source of their materials.	2	that. They produce dust and they're exposed
3	Q. I asked you a little bit about	3	to dust and they have pneumoconiosis cases
4	Italy.	4	where the dust exposure has been severe, but
5	Did you visit the mine in Italy	5	there's no major concern about controlling
6	where Johnson & Johnson at one point sourced	6	the dust at that time. It's probably it
7	talc from?	7	may have changed now, but
8	A. Yes, the Val Chisone mine.	8	Q. In the testing that you did on
9	Yeah. Yeah.	9	the two ore deposits and also baby powder
10	Q. And did you go there in person?	10	products with talc in them, were you ever
11	A. Oh, yes. Yep. Very	11	able to determine whether or not either the
12	interesting visit, yeah.	12	ore or any of the baby powder had asbestos in
13		13	it?
14	Q. And you mentioned you called it the Val Chisone mine?		
15		14 15	A. Well, we were part of a visit like that to take samples is to look
16	A. Yeah.		-
l	Q. Can you describe the area that	16	around to see if you can see anything which
17	that's located?	17	might represent an asbestos-type contaminant.
18	A. It's in the north of Italy,	18	And although looking at the rock specimens we
19	just not far from the border with France,	19	brought back, there were amphibole minerals,
20	just where the Alps start to develop. So it	20	but there was no obvious asbestos visible in
21	was very, very mountainous, very picturesque,	21	the mine.
22	and it was very difficult to get to the mine	22	Q. And after all the testing that
23	actually. They had a ski lift installed	23	you did, were you able to ever find asbestos
24	there to take workers in to work when the	24	in the samples or the deposit samples that
25	snow is on the ground.	25	you looked at?
	Page 35		Page 37
1	Q. And did you also visit a talc	1	A. No. Mineral types, yeah,
2	Q. And did you also visit a talc deposit in Windsor, Vermont, where Johnson &	2	A. No. Mineral types, yeah, amphibole mineral, but no asbestos, no.
2	Q. And did you also visit a talc deposit in Windsor, Vermont, where Johnson & Johnson at one point sourced talc from?	2 3	A. No. Mineral types, yeah, amphibole mineral, but no asbestos, no. Q. And were you experienced with
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2 3 4 5 6 7	Q. And did you also visit a talc deposit in Windsor, Vermont, where Johnson & Johnson at one point sourced talc from? A. Yes. Q. And were you there personally? A. Oh, yes. Yeah. Q. And did you test the ore	2 3 4 5 6	A. No. Mineral types, yeah, amphibole mineral, but no asbestos, no. Q. And were you experienced with the test methods that you used? A. To examine these specimens? Q. Yes. A. Oh, yes, I was, you know.
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	Daga 20		Daga 40
1	Page 38 that you are familiar with?	1	Page 40 samples here.
2	A. Yeah. I have seen this, yes.	2	Q. And this is kind of if we
3	Q. And this is there's some	3	start the story, this is appears to be one
4	people on here: Maryanne Boundy, Karen Gold,	4	of the first things that you did; is that
5	Kenneth Martin, William Burgess and John	5	right?
6	Dement.	6	A. Yeah, that's right.
7	In your experience in dealing	7	Q. And if we look at this
8	with dust and mines and so forth, are these	8	document, and I'm highlighting stuff on the
9	names familiar to you?	9	screen here, it says right here that these
10	A. Well, the one name is, John	10	are identity samples submitted to Fred Pooley
11	Dement. I know him quite well. We've	11	at University College?
12	actually published papers together.	12	A. Yes.
13	Q. Yeah.	13	Q. That's you, right?
14	A. Yeah, but	14	A. Yes.
15	Q. And what about here, the	15	Q. All right. And it indicates
16	Department of Environmental Health Sciences,	16	here that these are samples of Vermont
17	Harvard School of Public Health in	17	production talc, Windsor 66, which is used in
18	Massachusetts, have you heard of that	18	the manufacture of Johnson's baby powder.
19	organization?	19	Do you see that?
20	A. Yes.	20	A. Yes.
21	Q. And I'm focusing here when	21	Q. Are you familiar with the
22	we're talking about Vermont, and I'm	22	numbers Windsor 66?
23	highlighting here: "Since geological studies	23	A. Yeah, I'm familiar with Windsor
24	dating back from the early 1900s have shown	24	Minerals. The 66, yes.
25	that the Vermont talc deposits contain no	25	Q. And you'll see that there's a
-	Page 39		D . 41
1	rage 37		Page 41
1	asbestos."	1	description here of where these came from and
2	asbestos." Do you see that?	2	description here of where these came from and it says here that, "Our quality assurance
2 3	Do you see that? A. Yes.	2	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a
2 3 4	Do you see that? A. Yes. Q. And is that a view that in the	2 3 4	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a production line during each shift."
2 3 4 5	Do you see that? A. Yes. Q. And is that a view that in the work that you did over the years that we'll	2 3 4 5	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a production line during each shift." And as somebody who deals with
2 3 4 5 6	Do you see that? A. Yes. Q. And is that a view that in the work that you did over the years that we'll talk about that you was consistent with	2 3 4 5 6	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a production line during each shift." And as somebody who deals with talc testing, are you familiar with kind of
2 3 4 5 6 7	asbestos." Do you see that? A. Yes. Q. And is that a view that in the work that you did over the years that we'll talk about that you was consistent with what you concluded?	2 3 4 5 6 7	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a production line during each shift." And as somebody who deals with talc testing, are you familiar with kind of how that works?
2 3 4 5 6 7 8	asbestos." Do you see that? A. Yes. Q. And is that a view that in the work that you did over the years that we'll talk about that you was consistent with what you concluded? A. Yes.	2 3 4 5 6 7 8	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a production line during each shift." And as somebody who deals with talc testing, are you familiar with kind of how that works? A. Yes, they quality control, you
2 3 4 5 6 7 8 9	Do you see that? A. Yes. Q. And is that a view that in the work that you did over the years that we'll talk about that you was consistent with what you concluded? A. Yes. Q. And I'd like to show you	2 3 4 5 6 7 8	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a production line during each shift." And as somebody who deals with talc testing, are you familiar with kind of how that works? A. Yes, they quality control, you know. Yeah.
2 3 4 5 6 7 8 9	Do you see that? A. Yes. Q. And is that a view that in the work that you did over the years that we'll talk about that you was consistent with what you concluded? A. Yes. Q. And I'd like to show you some a study that you did, and I'm going	2 3 4 5 6 7 8 9	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a production line during each shift." And as somebody who deals with talc testing, are you familiar with kind of how that works? A. Yes, they quality control, you know. Yeah. Q. And if we look later on, we
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Do you see that? A. Yes. Q. And is that a view that in the work that you did over the years that we'll talk about that you was consistent with what you concluded? A. Yes. Q. And I'd like to show you some a study that you did, and I'm going to ask you some questions about it. A. Okay. (Pooley Exhibit 3 marked for identification.) QUESTIONS BY MR. BICKS: Q. And I think this is the third	2 3 4 5 6 7 8 9 10 11 12 13 14 15	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a production line during each shift." And as somebody who deals with talc testing, are you familiar with kind of how that works? A. Yes, they quality control, you know. Yeah. Q. And if we look later on, we have here your report on these samples, right? A. Yep. Q. And we can see here that you looked at ten samples, right? A. Yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Do you see that? A. Yes. Q. And is that a view that in the work that you did over the years that we'll talk about that you was consistent with what you concluded? A. Yes. Q. And I'd like to show you some a study that you did, and I'm going to ask you some questions about it. A. Okay. (Pooley Exhibit 3 marked for identification.) QUESTIONS BY MR. BICKS: Q. And I think this is the third exhibit, and you have this in front of you, Dr. Pooley. A. Yeah. Yeah, I've got it. Q. And this is a report that you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a production line during each shift." And as somebody who deals with talc testing, are you familiar with kind of how that works? A. Yes, they quality control, you know. Yeah. Q. And if we look later on, we have here your report on these samples, right? A. Yep. Q. And we can see here that you looked at ten samples, right? A. Yes. Q. And in terms of what you were doing in this report, it says that you were doing analysis performed, were implemented to establish the presence of asbestos fiber of
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Do you see that? A. Yes. Q. And is that a view that in the work that you did over the years that we'll talk about that you was consistent with what you concluded? A. Yes. Q. And I'd like to show you some a study that you did, and I'm going to ask you some questions about it. A. Okay. (Pooley Exhibit 3 marked for identification.) QUESTIONS BY MR. BICKS: Q. And I think this is the third exhibit, and you have this in front of you, Dr. Pooley. A. Yeah. Yeah, I've got it. Q. And this is a report that you wrote? A. Uh-huh.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a production line during each shift." And as somebody who deals with talc testing, are you familiar with kind of how that works? A. Yes, they quality control, you know. Yeah. Q. And if we look later on, we have here your report on these samples, right? A. Yep. Q. And we can see here that you looked at ten samples, right? A. Yes. Q. And in terms of what you were doing in this report, it says that you were doing analysis performed, were implemented to establish the presence of asbestos fiber of the chrysotile or amphibole types. Do you see that?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	asbestos." Do you see that? A. Yes. Q. And is that a view that in the work that you did over the years that we'll talk about that you was consistent with what you concluded? A. Yes. Q. And I'd like to show you some a study that you did, and I'm going to ask you some questions about it. A. Okay. (Pooley Exhibit 3 marked for identification.) QUESTIONS BY MR. BICKS: Q. And I think this is the third exhibit, and you have this in front of you, Dr. Pooley. A. Yeah. Yeah, I've got it. Q. And this is a report that you wrote? A. Uh-huh. Q. And you did several reports on	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a production line during each shift." And as somebody who deals with talc testing, are you familiar with kind of how that works? A. Yes, they quality control, you know. Yeah. Q. And if we look later on, we have here your report on these samples, right? A. Yep. Q. And we can see here that you looked at ten samples, right? A. Yes. Q. And in terms of what you were doing in this report, it says that you were doing analysis performed, were implemented to establish the presence of asbestos fiber of the chrysotile or amphibole types. Do you see that? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Do you see that? A. Yes. Q. And is that a view that in the work that you did over the years that we'll talk about that you was consistent with what you concluded? A. Yes. Q. And I'd like to show you some a study that you did, and I'm going to ask you some questions about it. A. Okay. (Pooley Exhibit 3 marked for identification.) QUESTIONS BY MR. BICKS: Q. And I think this is the third exhibit, and you have this in front of you, Dr. Pooley. A. Yeah. Yeah, I've got it. Q. And this is a report that you wrote? A. Uh-huh.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	description here of where these came from and it says here that, "Our quality assurance division takes a sampling at random from a production line during each shift." And as somebody who deals with talc testing, are you familiar with kind of how that works? A. Yes, they quality control, you know. Yeah. Q. And if we look later on, we have here your report on these samples, right? A. Yep. Q. And we can see here that you looked at ten samples, right? A. Yes. Q. And in terms of what you were doing in this report, it says that you were doing analysis performed, were implemented to establish the presence of asbestos fiber of the chrysotile or amphibole types. Do you see that?

		5 010			5 010
1	you've done v	Page 210 work for the World Health	1	Α.	Page 212 Other sources of material that
2	Organization	•	2	are referred	to as being asbestos, yes.
3	Α.	No, I didn't say that at all.	3		(Pooley Exhibit 27 marked for
4	Q.	Sure, the jury heard it. It	4	identi	fication.)
5	was on your (ev.	5	QUESTIONS BY	MR. LANIER:
6	_	Now, the bottom line is, is	6	Q.	Yeah.
7	you've talked	d about talc mines being	7	_	And I've handed you Exhibit
8	contaminated	by asbestos yourself, haven't	8	Number 28.	If we go back to something you
و ا	you?	- ,	9	wrote back i	n 1992, this is did I put a
10	Α.	I can't remember.	10		our copy, sir?
11	0.	Well, here's your CV.	11	Α.	Yes.
12	Α.	Yeah.	12	Q.	What does that sticker say?
13	0.	Exhibit 1. It's one of the	13	A.	Exhibit 27.
14	. ~	you put on your brag sheet, your	14	Q.	And it's this article? Okay.
15	stud sheet.	ou put on your brug blicce, your	15	_	of the order. Thank you very
16	A.	Yeah.	16	much.	Order. Indust you very
17	Α,	MR. BICKS: Objection to the	17		This is Exhibit 27.
18	form.	inc. Diano- Objection to the	18	Α.	Talc pneumoconiosis.
19	OUESTIONS BY	MD IANTED.	19	Q.	Yeah. Yeah.
20	Questions bi	Consultant on biological	20	Q• Α.	The pathological and
21	_	ineral dusts, collection and	21	mineralogica	
22		on to World Health Organization.	22	Q.	You're the F.D. Pooley on this,
23	A.	That's right.	23	aren't you?	Tou le the F.D. Fooley on this,
24	Q.	So I said that's one of things	24	A.	That's right.
25	~	gged about on your CV, and you	25	Q.	And you've got here I think
23	chac you bras	ged about on your cv, and you	25	٧٠	And you've got here I time
1	said no.	Page 211	1	there's a tw	Page 213
2	bara no.	I mean, it's on there; I didn't	2	ought to say	-
3	make that up		3	A.	Sure.
4	A.	No. No.	4	Q.	That should be "talc," right?
5	Q.	And now you're saying that	5	Q. A.	Yep.
6	_	And now you re saying that))	Δ.	
7	chey le gain	age and not to be believed?	ے	0	
l ′		age and not to be believed?	6	Q.	All right. "Minerals that may
l g		MR. BICKS: Objection.	7		All right. "Minerals that may talc include tremolite"
8	to the	MR. BICKS: Objection. THE WITNESS: No, I'm referring	7 8	contaminate	All right. "Minerals that may talc include tremolite" Do you see that?
9		MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me.	7 8 9	contaminate	All right. "Minerals that may talc include tremolite" Do you see that? Yeah.
9	QUESTIONS BY	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER:	7 8 9 10	contaminate	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite"
9 10 11	QUESTIONS BY Q.	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a	7 8 9 10 11	A. Q.	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that?
9 10 11 12	QUESTIONS BY Q. document you	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote	7 8 9 10 11	A. Q. A.	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah.
9 10 11 12 13	QUESTIONS BY Q. document you A.	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote Which has got chrysotile	7 8 9 10 11 12 13	A. Q. A. Q.	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah. Anthophyllite, I guess. I
9 10 11 12 13 14	QUESTIONS BY Q. document you A. asbestos writ	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote Which has got chrysotile ten on it.	7 8 9 10 11 12 13 14	A. Q. A. Q.	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah. Anthophyllite, I guess. I
9 10 11 12 13 14 15	QUESTIONS BY Q. document you A.	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote Which has got chrysotile eten on it. Yeah.	7 8 9 10 11 12 13 14 15	A. Q. A. Q. don't ever p	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah. Anthophyllite, I guess. I pronounce it right "antigorite"
9 10 11 12 13 14 15	Q. document you A. asbestos write	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote Which has got chrysotile ten on it.	7 8 9 10 11 12 13 14 15	A. Q. A. Q. don't ever p	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah. Anthophyllite, I guess. I pronounce it right "antigorite" Yeah.
9 10 11 12 13 14 15 16	QUESTIONS BY Q. document you A. asbestos writ Q. isn't it?	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote Which has got chrysotile ten on it. Yeah. Well, chrysotile is asbestos,	7 8 9 10 11 12 13 14 15 16	A. Q. A. Q. don't ever p	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah. Anthophyllite, I guess. I pronounce it right "antigorite" Yeah "chrysotile"?
9 10 11 12 13 14 15 16 17	QUESTIONS BY Q. document you A. asbestos writ Q. isn't it? A.	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote Which has got chrysotile ten on it. Yeah. Well, chrysotile is asbestos, Oh, sure it is. Yeah. Yeah.	7 8 9 10 11 12 13 14 15 16 17	A. Q. don't ever p	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah. Anthophyllite, I guess. I pronounce it right "antigorite" Yeah "chrysotile"? Yeah.
9 10 11 12 13 14 15 16 17 18	QUESTIONS BY Q. document you A. asbestos writ Q. isn't it? A. Q.	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote Which has got chrysotile ten on it. Yeah. Well, chrysotile is asbestos, Oh, sure it is. Yeah. Yeah. Okay. And those aren't the	7 8 9 10 11 12 13 14 15 16 17 18	A. Q. A. Q. don't ever p	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah. Anthophyllite, I guess. I pronounce it right "antigorite" Yeah "chrysotile"?
9 10 11 12 13 14 15 16 17 18 19	QUESTIONS BY Q. document you A. asbestos writ Q. isn't it? A. Q. only kinds.	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote Which has got chrysotile ten on it. Yeah. Well, chrysotile is asbestos, Oh, sure it is. Yeah. Yeah. Okay. And those aren't the The asbestos isn't just	7 8 9 10 11 12 13 14 15 16 17 18 19	A. Q. A. Q. don't ever p A. Q. A. Q. they?	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah. Anthophyllite, I guess. I pronounce it right "antigorite" Yeah "chrysotile"? Yeah. Those are asbestos, aren't
9 10 11 12 13 14 15 16 17 18 19 20 21	QUESTIONS BY Q. document you A. asbestos writ Q. isn't it? A. Q. only kinds. chrysotile ar	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote Which has got chrysotile ten on it. Yeah. Well, chrysotile is asbestos, Oh, sure it is. Yeah. Yeah. Okay. And those aren't the The asbestos isn't just and tremolite. There are other	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q. don't ever p	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah. Anthophyllite, I guess. I pronounce it right "antigorite" Yeah "chrysotile"? Yeah. Those are asbestos, aren't Yeah.
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9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	QUESTIONS BY Q. document you A. asbestos writ Q. isn't it? A. Q. only kinds. chrysotile ar varieties of	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote Which has got chrysotile ten on it. Yeah. Well, chrysotile is asbestos, Oh, sure it is. Yeah. Yeah. Okay. And those aren't the The asbestos isn't just and tremolite. There are other asbestos, aren't there? Aren't there?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Q. A. Q. don't ever p A. Q. they? A. didn't you?	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah. Anthophyllite, I guess. I pronounce it right "antigorite" Yeah "chrysotile"? Yeah. Those are asbestos, aren't Yeah. And you've forgotten tremolite,
9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	QUESTIONS BY Q. document you A. asbestos writ Q. isn't it? A. Q. only kinds. chrysotile ar varieties of	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote Which has got chrysotile ten on it. Yeah. Well, chrysotile is asbestos, Oh, sure it is. Yeah. Yeah. Okay. And those aren't the The asbestos isn't just and tremolite. There are other asbestos, aren't there? Aren't there? Yes, there are.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. Q. A. Q. don't ever p A. Q. they? A. didn't you? Q.	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah. Anthophyllite, I guess. I pronounce it right "antigorite" Yeah "chrysotile"? Yeah. Those are asbestos, aren't Yeah. And you've forgotten tremolite,
9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	QUESTIONS BY Q. document you A. asbestos writ Q. isn't it? A. Q. only kinds. chrysotile ar varieties of	MR. BICKS: Objection. THE WITNESS: No, I'm referring document you gave me. MR. LANIER: Well, sir, I'll refer to a wrote Which has got chrysotile ten on it. Yeah. Well, chrysotile is asbestos, Oh, sure it is. Yeah. Yeah. Okay. And those aren't the The asbestos isn't just and tremolite. There are other asbestos, aren't there? Aren't there?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Q. A. Q. don't ever p A. Q. they? A. didn't you?	All right. "Minerals that may talc include tremolite" Do you see that? Yeah "anthophyllite" Do you see that? Yeah. Anthophyllite, I guess. I pronounce it right "antigorite" Yeah "chrysotile"? Yeah. Those are asbestos, aren't Yeah. And you've forgotten tremolite,

		Page 214		Page 216
1	Q.	They're asbestos.	1	Q. Of course, that flies in the
2	A.	Yeah, fibrous and nonfibrous.	2	face of everything you've told the jury
3	Q.	Uh-huh. Both of them. Both	3	today, doesn't it?
4	kinds.		4	MR. BICKS: Objection to the
5	Α.	Yeah. Sure.	5	form.
6	Q.	You, when you weren't getting	6	QUESTIONS BY MR. LANIER:
7	paid by Joh	unson & Johnson, you're publishing	7	Q. Doesn't it?
8	and you're	saying in publication that talc	8	A. No.
9	has got	you've got talc contaminated with	9	Q. You've said today talc mines
10	tremolite.		10	don't have asbestos in them, haven't you?
11		What were the other asbestos	11	MR. BICKS: Objection to the
12	minerals?	Anthophyllite?	12	form.
13	A.	Uh-huh.	13	THE WITNESS: No, I said that
14	Q.	Oops, I didn't spell it right.	14	they do have the mineral, but not the
15	_	te. That's close enough.	15	asbestos. We're talking about two
16		Chrysotile?	16	completely different forms, whatever
17	Α.	Uh-huh.	17	the World Organization says.
18	Q.	Says antigorite. Is that an	18	OUESTIONS BY MR. LANIER:
19	asbestos mi		19	Q. No. Sir, this is what you
20	A.	No.	20	said.
21	Q.	Okay. If we go back to the	21	A. Yeah.
22	_	Health Organization, document	22	Q. You said that they don't
23		exhibit number do you remember?	23	-
23 24		-	24	have and yet you've said that you get traces of asbestos
24 25	-	the marked one.	25	
25	Α.	26.	23	MR. BICKS: Traces of
		Page 215		Page 217
1	Q.	Thank you.	1	tremolite.
2		Exhibit Number 26, principal	2	THE WITNESS: Yeah.
3		f asbestos, they include	3	QUESTIONS BY MR. LANIER:
4		don't they?	4	Q. Oh, that's no. No. In the
5	Α.	Yes.	5	Pittsburgh Corning deposition, you said
6	Q.	So also we've got chrysotile	6	asbestos.
7	· -	e not going to fuss that with them,	7	MR. BICKS: Objection to the
8	are you?		8	form.
9	Α.	Sorry?	9	QUESTIONS BY MR. LANIER:
10	Q.	You're not going to fuss that	10	Q. You used that word.
11	chrysotile	is a principal variety?	11	A. Did I?
12	Α.	No.	12	MR. BICKS: Objection to the
13	Q.	They also said that	13	form.
14		te is; you're not going to fuss	14	QUESTIONS BY MR. LANIER:
15	that, are y	ou?	15	Q. Yeah. Do you want let's
16	Α.	No.	16	look at it again, lest there be any concern.
17	Q.	So here you've got something	17	Do you not remember, sir?
18	where you'v	re published and you have said that	18	A. No. It was 1990, wasn't it?
19	chrysotile,	tremolite and anthophyllite	19	Q. Well, it's 1990, but I just
20		Which are varieties of	20	showed it to you a few minutes ago, so we're
21	asbestos?		21	2018 right now.
22	Α.	Uh-huh.	22	Remember?
23	Q.	is in talc. That's a	23	A. No, I can't remember back
24	publication	you did in 1992, correct?	24	28 years.
25	Α.	Yep.	25	Q. Let's just make sure you're on

		Page 31	1		Page 316
1	A.	No.	1		So just so that we're real
2	Q.	Okay. So you were in the Val	2	clear, even	though you may not have seen it,
3	Chisone min	ie.	3	you did see	found tremolite?
4		How many times did you go over	4	Α.	Yes.
5	there?		5	Q.	It's just your opinion that it
6	A.	I think I went twice to the	6	wasn't of th	ne right size to where you were
7	mine.		7 -	going to say	y that it was asbestos?
8	Q.	Oh, okay. So this this	8	Α.	It wasn't asbestiform, no.
9	wasn't for	years you were working on it?	9	Q.	It wasn't the right size for
10	A.	No. Only on the samples.	10	you?	
11	Q.	Only on the samples?	11	Α.	It wasn't asbestiform.
12	A.	Yeah.	12	Q.	Asbestiform?
13	Q.	Well, who did more work on the	13	Α.	Yes.
14	Val Chisone	mine than you did?	14	Q.	Yeah, there's just a difference
15	A.	I have no idea.	15	in those wor	rds. I just want to make it real
16	Q.	How about the people who run	16	clear. You'	re not saying it wasn't asbestos.
17	the Val Chi	sone mine?	17	You're sayir	ng that you've got a there's
18	Α.	I've actually never seen what	18	the word "as	sbestos," which is referring to
19	_	ctually did.	19		, and the asbestos mineral
20	Q.	Whoa. Okay. Timeout. This is	20	includes tre	emolite, right?
21	important.		21	Α.	Yeah.
22		You've never seen the work done	22	Q.	And then you've got another
23	by Val Chis	one?	23	-	ed called "asbestiform."
24	Α.	No.	24	Α.	Yes.
25	Q.	So Johnson & Johnson didn't	25	Q.	And that's where you wanted to
		D 211			B 04 E
1		Page 31)		Page 317
1	give you th		1	have your si	ize?
2	Α.	No.	1 2	A.	ize? And appearance, yeah.
2 3	A. Q.	No. See, because I was concerned	2 3	A. Q.	ize? And appearance, yeah. Yeah.
2 3 4	A. Q. about it wh	No. See, because I was concerned ten I heard you say that Johnson &	1 2 3 4	A. Q. A.	ize? And appearance, yeah. Yeah. Fibers.
2 3 4 5	A. Q. about it wh Johnson	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if	1 2 3 4 5	A. Q. A. Q.	ize? And appearance, yeah. Yeah. Fibers. Fibers?
2 3 4 5 6	A. Q. about it wh Johnson Johnson & J	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been	1 2 3 4 5 6	A. Q. A. Q. A.	ize? And appearance, yeah. Yeah. Fibers. Fibers? Yeah.
2 3 4 5 6 7	A. Q. about it wh Johnson Johnson & J identified,	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if Tohnson, if an issue had been then they'd take action.	1 2 3 4 5 6 7	A. Q. A. Q. A. Q.	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1?
2 3 4 5 6 7 8	A. Q. about it wh Johnson Johnson & Jidentified,	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah.	1 2 3 4 5 6 7 8	A. Q. A. Q. A. Q.	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah.
2 3 4 5 6 7 8	A. Q. about it wh Johnson Johnson & J identified, A. Q.	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson &	1 2 3 4 5 6 7 8 9	A. Q. A. Q. A. Q. A.	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio?
2 3 4 5 6 7 8 9	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never	1 2 3 4 5 6 7 8 9 10	A. Q. A. Q. A. Q. A. Q.	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size
2 3 4 5 6 7 8 9 10	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any	1 2 3 4 5 6 7 8 9 10 11	A. Q. A. Q. A. Q. A. Q. A. ratio wouldr	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size
2 3 4 5 6 7 8 9 10 11 12	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any a tests.	1 2 3 4 5 6 7 8 9 10 11 12	A. Q. A. Q. A. Q. A. Q. A. c. A. Q. A. p. A. p. A. p. A.	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size n't be Asbestiform by your
2 3 4 5 6 7 8 9 10 11 12	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own A.	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any a tests. Yeah.	1 2 3 4 5 6 7 8 9 10 11 12 13	A. Q. A. Q. A. Q. A. Q. A. Q. A. catio wouldr Q. definition	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size on the Asbestiform by your
2 3 4 5 6 7 8 9 10 11 12 13 14	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own A. Q.	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if Tohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any a tests. Yeah. And that Johnson & Johnson was,	1 2 3 4 5 6 7 8 9 10 11 12 13 14	A. Q. A. Q. A. Q. A. Q. A. Q. A. ratio wouldr Q. definition	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size and the endership of the end o
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own A. Q. you know, r	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any a tests. Yeah. And that Johnson & Johnson was, reasonable in their behavior and	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Q. A. Q. A. Q. A. Q. A. ratio wouldr Q. definition A. Q.	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size on the Asbestiform by your
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own A. Q. you know, r what they d	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any a tests. Yeah. And that Johnson & Johnson was, reasonable in their behavior and did and they put safety first, but	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Q. A. Q. A. Q. A. Q. A. Q. A. ratio wouldr Q. definition	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size of the Asbestiform by your Yeah though, they're still
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own A. Q. you know, r what they d they never	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any a tests. Yeah. And that Johnson & Johnson was, reasonable in their behavior and	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Q. A. Q. A. Q. A. Q. A. ratio wouldr Q. definition - A. Q. asbestos?	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size and the endership of the end o
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own A. Q. you know, r what they d they never company?	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if Tohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any tests. Yeah. And that Johnson & Johnson was, reasonable in their behavior and did and they put safety first, but showed you the work by the mine	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. A. Q. A. Q. A. Q. A. ratio wouldr Q. definition - A. Q. asbestos?	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size on't be Asbestiform by your Yeah though, they're still MR. BICKS: Objection to the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own A. Q. you know, r what they d they never company? A.	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if Johnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any a tests. Yeah. And that Johnson & Johnson was, reasonable in their behavior and tid and they put safety first, but showed you the work by the mine	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Q. A. Q. A. Q. A. Q. A. ratio wouldr Q. definition A. Q. asbestos?	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size of the Asbestiform by your Yeah though, they're still MR. BICKS: Objection to the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own A. Q. you know, r what they d they never company? A. Q.	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any a tests. Yeah. And that Johnson & Johnson was, reasonable in their behavior and did and they put safety first, but showed you the work by the mine No. Okay. As a sidenote, you did	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q. A. Q. A. Q. A. Q. A. ratio wouldr Q. definition A. Q. asbestos? form. QUESTIONS BY	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size of the Asbestiform by your Yeah though, they're still MR. BICKS: Objection to the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own A. Q. you know, r what they d they never company? A. Q. find tremol	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any a tests. Yeah. And that Johnson & Johnson was, reasonable in their behavior and lid and they put safety first, but showed you the work by the mine No. Okay. As a sidenote, you did ite in Val Chisone, didn't you?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q. A. Q. A. Q. A. ratio wouldr Q. definition A. Q. asbestos? form. QUESTIONS BY Q. mineral stru	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size of the Asbestiform by your Yeah though, they're still MR. BICKS: Objection to the MR. LANIER: In terms of the mineral, the acture hasn't changed, right?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own A. Q. you know, r what they d they never company? A. Q. find tremol	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any a tests. Yeah. And that Johnson & Johnson was, reasonable in their behavior and hid and they put safety first, but showed you the work by the mine No. Okay. As a sidenote, you did hite in Val Chisone, didn't you? Yeah, I think yeah, excuse	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. A. Q. A. Q. A. Q. A. ratio wouldr Q. definition A. Q. asbestos? form. QUESTIONS BY Q. mineral stru A.	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size of the Asbestiform by your Yeah though, they're still MR. BICKS: Objection to the MR. LANIER: In terms of the mineral, the acture hasn't changed, right? Yeah.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own A. Q. you know, r what they d they never company? A. Q. find tremol A. me, one of	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any a tests. Yeah. And that Johnson & Johnson was, reasonable in their behavior and lid and they put safety first, but showed you the work by the mine No. Okay. As a sidenote, you did ite in Val Chisone, didn't you?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Q. A. Q. A. Q. A. Q. A. Q. A. ratio wouldr Q. definition A. Q. asbestos? form. QUESTIONS BY Q. mineral stru A. Q.	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size of the result of the res
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. about it wh Johnson Johnson & J identified, A. Q. Johnson was pressured y of your own A. Q. you know, r what they d they never company? A. Q. find tremol	No. See, because I was concerned ten I heard you say that Johnson & based on your knowledge, if fohnson, if an issue had been then they'd take action. Yeah. And your idea that Johnson & a reasonable company who never you to come up with answers in any a tests. Yeah. And that Johnson & Johnson was, reasonable in their behavior and hid and they put safety first, but showed you the work by the mine No. Okay. As a sidenote, you did hite in Val Chisone, didn't you? Yeah, I think yeah, excuse	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. A. Q. A. Q. A. Q. A. ratio wouldr Q. definition A. Q. asbestos? form. QUESTIONS BY Q. mineral stru A.	And appearance, yeah. Yeah. Fibers. Fibers? Yeah. 3 to 1? Yeah. Ratio? Yeah, particles below that size of the Asbestiform by your Yeah though, they're still MR. BICKS: Objection to the MR. LANIER: In terms of the mineral, the acture hasn't changed, right? Yeah.

	Do 20 462		Daga 161
1	Page 462 A. To do what?	1	Page 464 instructions to witness
2	Q. To do these tests.	2	
3	A. No, it doesn't say	3	Please read your deposition over
4	Q. It doesn't say that J&J viewed	4	carefully and make any necessary corrections.
5	one of your techniques as too sensitive?	5	You should state the reason in the
6	A. Uh-huh.	6	appropriate space on the errata sheet for any
7	Q. Does it?	7	corrections that are made.
8	A. No.	8	After doing so, please sign the
9	MR. BICKS: Objection to the	9	errata sheet and date it. You are signing
10	form.	10	same subject to the changes you have noted on
11	MR. LANIER: All right. Pass	11	the errata sheet, which will be attached to
12	the witness. We're done. Thank you.	12	your deposition.
13	VIDEOGRAPHER: This marks the	13	It is imperative that you return
14		14	the original errata sheet to the deposing
15	end of today's deposition. The time is 6:03 p.m. We're going off the	15	attorney within thirty (30) days of receipt
16	record.	16	of the deposition transcript by you. If you
17	(Deposition concluded at 6:03 p.m.)	17	fail to do so, the deposition transcript may
1	(Deposition continued at 0.03 p.m.)	18	be deemed to be accurate and may be used in
18 19		19	court.
20		20	
21		21	
22		22	
23		23	
24		24	
25		25	
1			
-			
1	Page 463 CERTIFICATE	1	Page 465
1 2	CERTIFICATE		Page 465 ACKNOWLEDGMENT OF DEPONENT
2 3	CERTIFICATE I, CARRIE A. CAMPBELL, Registered Diplomate Reporter, Certified Realtime	2 3	ACKNOWLEDGMENT OF DEPONENT
2	CERTIFICATE I, CARRIE A. CAMPBELL, Registered Diplomate Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do	1 2	ACKNOWLEDGMENT OF DEPONENT I,, do
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